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December 5, 2003

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AZ CORPORATION COMMISSION
DIRECTOR OF UTILITIES

Mr. Ernest Johnson
Director of Utilities
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

Dear Sir:

I was a previous co-owner of the stock of the Beaver Valley Water Company, Beaver Valley Estates, P.O. Box 421, Payson, Arizona 85541. The other co-owner of the stock was Gene Ward of Phoenix, Arizona.

Please treat this letter as our request for approval of the transfer of the outstanding stock to Michael Davoren of Payson, Arizona.

All of the outstanding stock in Beaver Valley Water Co. was sold to Mr. Davoren on January 29, 2003. On April 15, 2003 he filed an application for rate increase which was granted in October of this year.

Forgive our tardiness in making this late request for approval of the transfer of the stock.

The Arizona Department of Environmental Quality supplied a compliance report, which was part of the rate increase application.

I shall secure another compliance report and forward same to you.

Again, please forgive our tardiness in this regard and we await your action on the approval transfer request.

Sincerely,

Edgar M. Delaney

Arizona Corporation Commission

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cc: Jim Fisher
Utilities DivisionAZ CORP COMMISSION
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